

JANE ROE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

LARRY CRAWFORD, Director of the Missouri
Department of Corrections,
in his official capacity, and
CYNDI PRUDEN, Acting Superintendent,
Women's Eastern Reception, Diagnostic and
Correctional Center, in her official capacity,

Defendants.

1. I am the President and CEO of Planned Parenthood of the St. Louis Region, (Planned Parenthood), 4251 Forest Park Blvd, St. Louis, MO 63108. I have worked at Planned Parenthood since 1991.
2. In my capacity as President and CEO, I oversee the operations of Reproductive Health Services of Planned Parenthood of the St. Louis Region (RHS) where procedures to terminate pregnancy are performed.
3. As this Court is aware, RHS provided medical services to Jane Roe, the named plaintiff in this action.

4. Since this Court's order of October 13, 2005, RHS has been contacted by three additional inmates in the custody of the Missouri Department of Corrections (DOC) seeking to terminate their pregnancies.

5. As of today's date, the requested procedures have been performed by RHS on two of these three DOC inmates.


6. RHS expects to provide the requested medical services to the fourth DOC inmate in the near term.

7. RHS has worked with the relevant personnel from DOC to provide the requested medical services to these patients while addressing the DOC's safety, security and logistical concerns.

8. Patient confidentiality prevents Planned Parenthood and RHS from providing additional details. Moreover, because of these confidentiality concerns, no details other than those laid out in this Declaration have been or can be provided to Plaintiffs' counsel.

I declare under penalty of perjury that the foregoing information is true and correct.

Dated: November 10, 2005


Paula Gianino